

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHERYL LYNN BROCK

CHAPTER 13 NO.:

18-03856 - JAW

TRUSTEE'S RESPONSE TO
DEBTOR'S CERTIFICATION AND MOTION FOR ENTRY OF DISCHARGE

COMES NOW Trustee, Harold J. Barkley, Jr., and files his Response to Debtor's Certification and Motion for Entry of Chapter 13 Discharge (DK # 51); and in support thereof would most respectfully show unto this Honorable Court as follows:

1. That, the Trustee does not have any objection to the Debtor receiving a discharge.

However, the Debtor has a potential lawsuit or settlement and any order entered discharging and closing the case should reserve the right of the Trustee, or any successor Trustee, to reopen this case to disburse settlement proceeds of any recovery from the claim previously disclosed to the Trustee or listed in the Debtor's schedules.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Response be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Trustee's Response, and for such other, further, and general relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: November 16, 2023

Respectfully submitted,

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR. – MSB #2008
CHAPTER 13 TRUSTEE
POST OFFICE BOX 4476
JACKSON, MS 39296-4476
PHONE: 601/362-6161
FAX: 601/362-8826
E-MAIL: HJB@HBARKLEY13.COM

C E R T I F I C A T E

I, Harold J. Barkley, Jr., Trustee do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U. S. Trustee
Ustpregion05.ja.ecf@usdoj.gov

Hon. Richard R. Grindstaff
grindstaf@yahoo.com

Hon. Bryce Kunz
brycekunzlaw@gmail.com

Cheryl Lynn Brock
219 Jefferson Street
Richland, MS 39218

Dated: November 16, 2023

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR.